

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**INDICTMENT FOR THEFT OF GOVERNMENT FUNDS**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL DOCKET NO.</b>
<b>v.</b>	*	<b>SECTION:</b>
<b>RYANT DONNAVAN PRICE</b>	*	<b>VIOLATION: 18 U.S.C. § 641</b>

\* \* \*

The Grand Jury charges that:

**COUNT 1**

**A AT ALL TIMES MATERIAL HEREIN:**

1. Prior to August and September of 2005 and through the present, the defendant, **RYANT DONNAVAN PRICE**, resided at and used as his primary residence a home located at 11754 River Road in Saint Rose, Louisiana, in the Eastern District of Louisiana.
2. From on or about January 22, 1987, to the present, the defendant, **RYANT DONNAVAN PRICE**, also had an ownership interest in a house located at 3651 Fairmont Drive, New Orleans, Louisiana, in the Eastern District of Louisiana.
3. Hurricane Katrina made landfall in Louisiana on August 29, 2005, and caused widespread damage to the Gulf Coast region of Louisiana, including the New Orleans area.

4. Pursuant to an act of Congress of the United States of America with the concurrence and agreement of the President of the United States, funds were appropriated to the Department of Housing and Urban Development (“HUD”) for a Community Development Block Grant (“CDBG”) for Louisiana hurricane victims. The purpose of this CDBG was to assist and aid owners of property damaged or destroyed by Hurricanes Katrina and Rita in August and September of 2005. The grant money was disbursed under a program known as the Louisiana Road Home Program (the “Program”). HUD prepared the rules and regulations governing the disbursement of grant money through the State of Louisiana. The State of Louisiana, through the Office of Community Development, Division of Administration, contracted with ICF International, Inc. to administer the Program.

5. One of the major requirements for receiving grant money from the Program was that the damaged property be the primary residence of the applicant on August 29, 2005.

**B. THE OFFENSE OF THEFT OF GOVERNMENT FUNDS**

1. From on or about September, 2006, to on or about June, 2007, in the Eastern District of Louisiana, the defendant, **RYANT DONNAVAN PRICE**, did willfully and knowingly steal money and funds belonging to the United States, in that he falsely stated in an application for funds and money belonging to the United States, administered by the Road Home Program, that his primary residence on August 29, 2005, the day Hurricane Katrina made landfall in Southeastern Louisiana, was 3651 Fairmont Drive, New Orleans, Louisiana, when in truth and fact, the defendant, **RYANT DONNAVAN PRICE**, well knew that his primary residence was not 3651 Fairmont Drive, New Orleans, Louisiana, on the day Hurricane Katrina struck

Southeastern Louisiana, said money having a value of \$150,000; all in violation of Title 18, United States Code, Section 641.

### **NOTICE OF FORFEITURE**

1. The allegations in Count 1 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provision of Title 18, United States Code, Section 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Count 1 defendant, **RYANT DONNAVAN PRICE**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Sections 641.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 641 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.

A TRUE BILL:

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FOR PERSON

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JIM LETTEN  
United States Attorney  
Louisiana Bar Roll Number 8517

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JAN MASELLI MANN  
First Assistant U.S. Attorney  
Louisiana Bar Roll Number 9020

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New Orleans, Louisiana  
January 23, 2009